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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
 FOR THE
 NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

Plaintiffs,

vs.

PLAINTIFFS' SUBMISSION OF
 STATEMENT OF ATTORNEYS' FEES
 AND COSTS

JUNG JIN CORPORATION, a CNMI corporation,
 ASIA ENTERPRISES, INC., a CNMI corporation,
 PARK HWA SUN and KIM HANG KWON,

Defendants.

Summary Judgment was granted to Plaintiffs on August 14, 2006. Plaintiffs were instructed to file a detailed statement of reasonable attorney's fees and costs to which they are entitled under the Fair Labor Standards Act, 29 U.S.C. § 216(b), the CNMI Minimum Wage and Hour Act, 4 C.M.C. § 9244(b), the CNMI Nonresident Workers Act, 3 C.M.C. § 4447(d) (2000) and Fed. R. Civ. P. 54(d).

Accordingly, attached hereto is a detailed Statement of the time spent by the undersigned, the lead attorney for Plaintiffs, and attorney Sam Randall, who assisted the undersigned with portions of the prosecution of the above-captioned case against the defendants herein. The undersigned has been practicing law in the Commonwealth for almost nine years and a significant portion of his work has been concentrated in labor and employment law, particularly Fair Labor Standards Act litigation, where the undersigned continues to develop experience in the field. As detailed in the Statement submitted herewith, the undersigned is billing \$200.00 per hour for 175.4 hours of time spent on

1 developing and drafting the claims against the defendants, for substantial discovery efforts aimed at
2 establishing underlying liability and the joint nature of Plaintiffs' employment relationship with the
3 four defendants, with continued settlement negotiations, and when such negotiations failed, with
4 motions for substantive relief against the defendants. The undersigned's time was also spent
5 developing a case against the successor to all or substantially all of the defendants' assets to whom
6 defendants transfer said assets after the initiation of this lawsuit against them.

7 The attorney associated with the undersigned is an attorney recently licensed to practice law
8 in the Commonwealth, but with substantial practice experience in North Carolina prior to relocating
9 to Saipan. Mr. Randall was instrumental in reviewing and preparing initial motions for sanctions
10 against the corporate defendants for failing to obtain counsel after their attorney withdrew, and in
11 preparing a motion to bring in defendants' successors. A total of 12.2 hours of time, billed at \$150.00
12 per hour, is included in Plaintiffs' Statement with regard to Mr. Randall's time.

13 An additional 4.2 hours of time billed at \$45.00 per hour is included in the Statement for time
14 spend by the undersigned's staff with regarding to document control and other discovery assistance
15 in what amounted to be fairly substantial document production and other discovery from
16 Defendants. The total amount of \$189.00 has been included in the time portion of Plaintiffs'
17 Statement, but is properly reflected as costs in the proposed order submitted herewith.

18 Also included in Plaintiffs' Statement is a breakdown of costs associated with prosecuting
19 Plaintiffs' case, including costs for filing fees, service of process, copy and facsimile charges,
20 transcription costs, translation expenses, Westlaw charges, postage and mileage all billed at standard
21 rates. Submitted together with Plaintiffs' Statement is a Bill of Costs on form AO133 with
22 supporting documentation as and Exhibit thereto. Plaintiffs stand ready to provide any additional
23 support for the fees and costs detailed in Plaintiffs' Statement that the Court deems necessary and
24 warranted.

25 In all, Plaintiffs submit that the amount of \$36,910.00 in attorney fees were reasonably
26 incurred in the prosecution of Plaintiffs' case against the Defendants, and \$5,547.62 in expenses were

1 necessarily incurred by Plaintiffs, to date, herein. Accordingly, Plaintiffs respectfully request that the
2 Court grant such fees and costs in the amounts described in the Statement and this submission and
3 issue a judgment for Plaintiffs and against the Defendants, jointly and severally, that includes the
4 damages determined by the Court in its August 14, 2006 Order Granting Plaintiffs' Motion for
5 Summary Judgment, with the additional amounts stated above for reasonable attorneys' fees and
6 costs.

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8 Respectfully submitted this 21st day of August, 2006.

9
10 /s/ Mark B. Hanson

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